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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STATEMENT OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS IN SUPPORT OF THE  
DEBTORS' SECOND OMNIBUS MOTION  
PURSUANT TO 11 U.S.C § 365(a), FED. R.  
BANKR. P. 6006, AND B.L.R. 6006-1 FOR  
AN ORDER (I) APPROVING  
ASSUMPTION OF CONTRACTS IN  
CONNECTION WITH THE  
COMMUNITY PIPELINE SAFETY  
INITIATIVE AND (II) GRANTING  
RELATED RELIEF**

Date: August 14, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Docket No. 3176

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2 The Official Committee of Unsecured Creditors (the “Official Committee”) respectfully  
3 submits this statement in support of the Debtors’ *Second Omnibus Motion Pursuant to 11 U.S.C*  
4 *§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order (I) Approving Assumption of*  
5 *Contracts in Connection with the Community Pipeline Safety Initiative and (II) Granting Related*  
6 *Relief* (the “CPSI Motion”) [Docket No. 3176].<sup>1</sup>

8 **STATEMENT**

9 The Official Committee fully supports efforts by the Debtors to enhance and ensure the  
10 safe and reliable operation of their businesses. The Official Committee views the CPSI Motion as  
11 a positive step towards protecting the Debtors’ customers and other community residents in the  
12 areas where the Pipeline System is located. By assuming the CPSI Agreements, the Debtors will  
13 better be able to safeguard continued access to their Pipeline System to: (i) inspect, maintain and  
14 monitor the system’s integrity; (ii) undertake preventative measures; (iii) implement the CPSI  
15 safety program; and (iv) grant access to first responders and safety crews in emergency situations.  
16 Assuring such access is critical to both the continued safe operation of the Pipeline System and  
17 allowing the Debtors to comply with various federal, state and local safety and operational  
18 regulations. As such, the Official Committee believes that assuming the CPSI Agreements is a  
19 sound exercise of the Debtors’ “business judgement” and supports the Court’s approval of the  
20 relief sought in the CPSI Motion.  
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24 [Remainder of Page Intentionally Left Blank]  
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<sup>1</sup> Capitalized terms not defined herein have the meaning ascribed to them in the CPSI Motion.

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**CONCLUSION**

For the reasons set forth above, the Official Committee respectfully requests that the Court grant the CPSI Motion and such other relief as may be appropriate.

Dated: August 6, 2019

**MILBANK LLP**

/s/Gregory A. Bray  
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SAMUEL A. KHALIL  
GREGORY A. BRAY  
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